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February 12, 2013

Shanni Snyder
P.O. Box 96
East McKeesport, PA 15035

Shanni Snyder, pro se
2009 Luehm Avenue
North Versailles, PA 15137

**Re: Shanni Snyder, et al v. Michael Daugherty, et al
In the United States District Court for the Western District of Pennsylvania
Civil Division; No: 11-0879
Our File No: 04048.191**

Dear Ms. Snyder:

Pursuant to Order of Court, you were to notice any depositions to be taken in this case no later than Friday, April 1, 2013. I received a document from you entitled "Notices of Deposition" on February 6, 2013. Even allowing three days for mail, your notice was received grossly out of time.

More importantly, your purported Notice of Deposition is fatally flawed and therefore, will not be honored.

A Notice of Deposition necessarily requires a statement that it will be taken in front of an individual who is "an officer authorized to administer oath either by federal law or by the law in the place of the examination." See FRCP 28(a)(1)(A). Your Notice of Deposition does not include this information. Rather, it appears as though you intend to take the depositions of these officers by setting up a video recorder. Furthermore, your Notice of Deposition indicates that "the taking of this deposition may be adjourned from day to day until completed, and may occur over several days." The federal rules limit you to 7 hours per deposition. Therefore, no deposition will "occur over several days."

In that your purported Notice of Deposition is fatally flawed, you should proceed with the understanding that none of the officers will appear as you purportedly direct. You are on sufficient notice that if you disagree, once you have the opportunity to review Rules 28, 29 and 30, then I suggest you immediately file an appropriate motion with the court. The Defendants are under no obligation to obtain a protective order from the court because your Notice of Deposition is not a valid discovery notice or request.

Feel free to call me should you have any questions.

Very truly yours,

Paul D. Krepps, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | |
|---------------------------|------------------|
| SHANNI SNYDER, |) No. 11 civ 879 |
| |) |
| Plaintiff, |) |
| |) |
| v. |) |
| |) |
| MICHAEL DAUGHERTY, et al, |) |
| |) |
| Defendants. |) |

NOTICES OF DEPOSITION

To the Defendants:

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff hereby notices the following depositions. These depositions may be videotaped and Plaintiff provides notice to Defendants and the other parties to this action that the deposition may be used at the time of trial. The taking of this deposition may be adjourned from day to day until completed, and may occur over several days.

The deposition shall take place at the following location, subject to change on notice at least 10 days before the deposition: 2009 Leuhm Avenue, North Versailles, PA 15137.

Michael Daugherty
March 18, 2013
10:15 a.m.

David Bertok
March 19, 2013
10:15 a.m.

Robert Rizzo
March 20, 2013
10:15 a.m.

James Novak
March 21, 2013
10:15 a.m.

Gregory Arendas
March 22, 2013
10:15 a.m.

Robert Dippolito
March 25, 2013
10:15 a.m.

Nicholas Dreistadt
March 26, 2013
10:15 a.m.

William Sombo
March 27, 2013
10:15 a.m.

Carl Steinkopf
March 28, 2013
10:15 a.m.

William Kauffman
March 29, 2013
10:15 a.m.

Jeffrey Bouldin
April 1, 2013
10:15 a.m.

William Bouldin
April 2, 2013
10:15 a.m.

Plaintiff will accommodate reasonable rescheduling/changes to the order of the depositions based on Defendants' employment needs.

Respectfully submitted,

/s/ Shanni Snyder

Shanni Snyder
PO Box 96
East McKeesport PA 15035
(412) 758-1371
s.snyder@box96.net

PLAINTIFF

CERTIFICATE OF SERVICE

I, Shanni Snyder, affixed postage prepaid, First Class mail, and deposited this Notices of Deposition into the United States Mail on February 1, 2013, addressed to Paul D. Krepps, Esquire; Marshall Dennehey Warner Coleman & Goggin.

/s/ Shanni Snyder

Shanni Snyder